

UNITED STATES BANKRUPTCY COURT
DISTRICT OF HAWAII

STATE OF HAWAII by its OFFICE
OF CONSUMER PROTECTION

CASE NO. 15-446
Chapter 7

V.
ANABEL GASMEN CABEBE, et al

DEFENDANT MORTGAGE ENTERPRISE INVESTMENTS
OPPOSITION TO PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT

U.S. BANKRUPTCY COURT
DISTRICT OF HAWAII
2017 FEB 21 A 11:17
MICHAEL J. ROWLING
CLERK OF COURT

Defendant, Mortgage Enterprise Investments by its attorney in fact Anthony Williams did not receive any First Amended Complaint and therefore is responding to Plaintiff's request for entry of default supported by the following facts:

1. Mortgage Enterprise Investments herein "MEI" has been in business since 2002 and never had any Complaints from any consumers regarding foreclosure assistance.
2. MEI has been operating in the State of Hawaii since April 2013 and have assisted hundreds of homeowners to stay in their homes during their foreclosure.
3. Edna Franco, Henry Malinay, Rowena Valdez and Anabel Cabebe set up a fraudulent company called Mortgage Enterprise (ME) in order to deceive homeowners into thinking it was actually MEI when it was not.
4. Edna Franco has been sanctioned three (3) times by your office for fraud which MEI had no prior knowledge of.
5. MEI hired Edna Franco, Henry Malinay, Hep Givinn and Anabel Cabebe under the pretense that they were honest people and would conduct MEI's business according to company policy and the law.
6. MEI discovered that they were illegally over charging customers and making them pay in cash with no receipt, I Anthony Williams immediately fired all of them and put them on the Common Law Office of America (CLOA) website under PUBLIC NOTICE to warn the public that they are scam artists.
7. I filed several complaints with the Office of Consumer Protection (OCP) and made a formal Complaint to the FBI about their fraudulent activity because they were ruining MEI's reputation.
8. MEI has never scammed any homeowners and most of MEI's customers are still in their homes because of our program.
9. Most of the fraudulent activity occurred while I was unlawfully incarcerated for 9 months for rape and child molestation.
10. I didn't find out that they had created a copy cat company until after I was released and got documents from your office about ME.
11. MEI's process has been approved by the Anti-Predatory Lending Database and was cleared by several District Attorneys in several other states that MEI conducts business.
12. MEI denies any involvement in any wrong doing and still stand behind its guarantee to its homeowners.
13. MEI never promised any homeowners that were in foreclosure that we could get their home free and clear, This lie was generated by Henry Malinay and Edna Franco,

14. MEI's Foreclosure Disclosure specifically states that "This contract agreement is predicated upon pre-foreclosure status and pre-judicial court order or judgment being rendered." It goes further to state, "Common Law Office of America makes no guarantees except that we will represent you to the best of our ability to protect your property interests and execute our fiduciary duties to the same."
15. MEI never instructed any homeowner not in foreclosure to stop making their mortgage payments. Our program is for clients who can't make their mortgage payments and are in foreclosure or are on the verge of foreclosure.
16. MEI is a registered company in Hawaii with its principal business being foreclosure assistance.
17. I personally filed a Federal suit against Edna Franco, Henry Malinay and Hep Guinn for fraud but it was dismissed because I couldn't locate them to have them served.
18. The OCP have failed MEI and the homeowners of Hawaii and I intend to file a class action lawsuit on behalf of the homeowners if the OCP doesn't procure justice for MEI's homeowners.
19. MEI and CLOA businesses have been unjustly slandered as being fraudulent or a scam when it was former employees who committed the fraudulent acts and scammed many people that the OCP is a witness to how Hep Guinn and other former employees stole some of MEI's and CLOA's documents to facilitate their scam.
20. No homeowner was jeopardized by the policy and procedures of MEI or CLOA because all of the activities of MEI and CLOA are according to law.
21. MEI does feel that Anabel Cabebe was influenced and scammed by Edna Franco and Henry Malinay to start ME thinking it was approved by MEI. For that reason MEI will not pursue any charges against Anabel Cabebe.
22. MEI and CLOA denies any and all assertions that their activities are fraudulent or that any homeowner was ever scammed using our services.
23. I, Anthony Williams the attorney in fact for MEI and CLOA, am currently unlawfully incarcerated for a bogus grand theft of a house for saving a client from foreclosure or I would have been able to provide exhibits for the Complaint that I filed to the OCP and the FBI regarding Edna Franco, Henry Malinay and Hep Guinn scamming homeowners.

WHEREFORE, the entry of default should be denied based on the foregoing facts and MEI exonerated of any wrong doing or fraudulent practices.

Under penalty of perjury, I declare that the foregoing is true and correct. Executed this 7th day of February 2017.

Anthony Williams

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent via U.S. Mail to the OCP, James F. Evers, 235 S. Beretania Street, Room 801, Honolulu, HI 96813 on February 8, 2017.

Anthony Williams